

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the matter of:

Numbering Resource Optimization

CC Docket No.96-98  
CC Docket No.99-200

**FURTHER COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA**

The California Public Utilities Commission and the People of the State of California (California or CPUC) respectfully submit these comments in response to the Public Notice of the Common Carrier Bureau (CCB or Bureau) issued in this docket on January 15, 2002.

**I. INTRODUCTION**

The Federal Communications Commission (the Commission) tasked the CCB with the responsibility of developing an audit program to conduct random and “for cause” audits, the purpose of which is to monitor compliance with the Commission’s numbering rules and applicable industry guidelines, as well as to verify the accuracy and validity of the numbering data submitted to the Commission.<sup>1</sup> In the Public Notice, the Bureau now seeks comment on the Numbering Audit Program for random audits.

The CPUC has reviewed and generally is in agreement with the Numbering

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<sup>1</sup> See Public Notice, DA 02-108, January 15, 2001, p.1 in CC Docket No. 96-98 and Docket No.99-200.

Audit Program as outlined in the Public Notice. Based on the experience of CPUC staff in conducting audits of the 310 and 909 area codes, California proposes the following recommended modifications, which are listed below:<sup>2</sup>

## **Appendix A: Numbering Audit Program**

### **1. General**

The CPUC recommends the following addition to ensure that each Data Request identifies the specific scope of the audit:

#### **Item 5**

- Send “Data Request” to the audited telecommunications carrier to obtain information before performing the audit procedures, and specify which NRUF you intend to audit.

### **2. Assigned Numbers**

The CPUC recommends that number holdings be looked at with greater granularity, and that the auditor, as well as the FCC, have the ability to select samples.

The suggested changes are as follows:

#### **Item 14**

- The auditor working with the FCC will select a sample of thousand-blocks from the company’s assigned numbers reported on the most recent Form 502.

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<sup>2</sup> The 310 audit was released in February 2001. The 909 audit was released in December 2001. The CPUC provided un-redacted copies of both audits to the staff of the Network Services Division in the FCC’s

### 3. **Intermediate Numbers**

The CPUC recommends that, since intermediate numbers provided to carriers and to non-carriers have different reporting requirements, the two should be evaluated separately. The recommended changes are as follows:

#### **Item 29(a)**

- Determine and document the company's processes and procedures for handling and inventorying intermediate numbers provided to carriers. Also determine and document the company's processes and procedures for changing numbers provided to carriers from intermediate to available numbers when the numbers are returned or no longer needed.

#### **Item 29(b)**

- Determine and document the company's processes and procedures for handling and inventorying intermediate numbers provided to non-carrier entities. Also determine and document the company's processes and procedures for changing numbers provided to non-carriers from intermediate to assigned numbers.

With respect to Items 30(a) and 30 (b), California recommends that since intermediate numbers provided to carriers have different reporting requirements from those for intermediate numbers provided to non-carriers, the two types of intermediate numbers should be evaluated separately. The CPUC further suggests tracing the sample of intermediate numbers provided to carriers to the NRUF report of the carrier receiving the intermediate numbers in order to verify the information reported by the audited

company, and to identify non-reporting by the receiving carrier. The proposed changes are as follows:

**Item 30(a)**

- Obtain a sample of intermediate numbers provided to carriers.

Trace the sample to the NRUF report of the carrier receiving the intermediate numbers. Note any exceptions and the company's and receiving carrier's response to the exceptions.

**Item 30(b)**

- Obtain a sample of intermediate numbers provided to non-carrier entities. Trace the sample to billing records/inventory to determine if the numbers are still intermediate, i.e. not assigned to an end-user. Note any exceptions and the company's response to the exceptions.

**4. NRUF Database (Form 502)**

The CPUC recommends that the audit program call specific attention to the forecast portion of the Form 502. This recommendation will make certain the auditors review the Forecast portion as well as the Utilization portion in the Numbering Audit Program, and will provide a greater knowledge of the specific methods used to derive Forecast information. The proposed changes are as follows:

**Item 67**

- Determine and document the company's processes and procedures for filling out, completing and filing of both the Utilization and Forecast part of Form 502.

**Item 68(a)**

- Determine and document where the Utilization information for the Form 502 is derived from and how it is input into the system. Also document the processes used for pulling the information from the system(s).

**Item 68(b)**

- Determine and document the methodology used by the company to develop the Forecast information for the Form 502. Also document the processes used for pulling historical information, if applicable, from the system(s) to develop the forecast.

**Item 69(a)**

- Determine and document the controls that ensure the accuracy of the Utilization information in the Form 502.

**Item 69(b)**

- Determine and document the controls that ensure the accuracy of the Forecast information developed for and entered in the Form 502.

**Attachment 1: Standard Data Request**

California recommends that the Standard Data Request be fleshed out in even greater detail to maximize the quality of information obtained. We suggest the following addition be made to the introductory sentence of Attachment 1:

- Please provide the following information by (date), for the (date, e.g. 12/31/01) NRUF.

California recommends the following addition be made in order to ensure that the Forecast portion of Form 502 is not overlooked during the audit process:

**Item (c)(2)**

- What individual or group has responsibility for filling out the Forecast portion of Form 502? Where is that individual or group located?

The CPUC recommends that the following items be expanded to include a request for information on both historical and current records to ensure that carriers report on the availability and location of historical data in addition to the current data requested. The proposed changes are as follows:

**Item (e)**

- Where are the pertinent number related documents and records maintained for both historical and current data?

**Item (f)**

- Where are the billing records maintained for both historical and current data?

**Item (g)**

The CPUC recommends that the FCC clarify in a footnote to Item (g) the specific information that should be included in the representation letter because numbering staff may not be familiar with AICPA standards and compliance attestation agreements.

California recommends that the FCC clarify what is meant by reclaiming numbers, and explain whether they are interested in (a) how the carrier re-acquires

intermediate numbers not in use from carriers or non-carrier entities, and/or (b) how the carrier reacquires numbers not in use from its large business customers.

**Item p(1)**

- Describe the company's processes and procedures for reclaiming numbers not in use from carriers or non-carrier entities. What individual or group has responsibility for handling this process, and where is the individual or group located?

**Item p(2)**

- Describe the company's processes and procedures for reclaiming numbers not in use from carriers or non-carrier entities. What individual or group has responsibility for handling this process, and where is the individual or group located?

The CPUC recommends the Data Request be expanded to obtain detailed information with respect to minimum fill rate and sequential numbering assignment. The suggested addition is as follows:

**Item q(2)**

- Describe the company's process and procedures for complying with the FCC's rules on minimum fill rate and sequential numbering assignment. What individual or group has responsibility for handling this process, and where is the individual or group located?

The CPUC recommends the following addition in order to ensure the carrier's compliance with the FCC's First NRO Order, which requires carriers to maintain records relating to various numbering subcategories:

**Item (t)**

- Describe the company's processes and procedures for handling its eight additional numbering subcategories. What individual or group has responsibility for handling this process and where is the individual or group located?

California recommends the following addition to require carriers to provide information on the specific point of contact in an effort to facilitate the audit:

**Item (u)**

- Provide the following information for the assigned point of contact for this audit:

Name

Title

Phone number(s)

E-mail address

Mailing address

Location of audit contact if different from mailing address

**Attachment 2: Internal Control Questionnaire**

**F. Reserved Numbers**

The CPUC recommends the following addition in an effort to determine the carrier's compliance with FCC guidelines.



#### **Question No. 4**

- Does the company maintain documentation of customers' requests for reserved numbers?

#### **G. Administrative Numbers**

California proposes the following addition in order to verify the validity or accuracy of the specific classification of numbers held by carriers.

#### **Question No. 3**

- Does the company have processes and procedures to periodically review and assess the validity of the classification of the numbers categorized as administrative.

#### **General Modification**

The CPUC also proposes a general modification to the Numbering Audit Program with respect to the term “thousand-blocks.” While a thousand-block consists of only one thousand numbers, it is often referred to in the Numbering Audit Program as a “thousands-block” which, on its face, is confusing, and may imply that more than one thousand numbers make up each thousand-block. As such, we recommend that the “s” often placed after the word “thousand,” in the term “thousand-block” be eliminated.

## **II. CONCLUSION**

For the reasons stated above, the CPUC recommends that the FCC adopt the recommended modifications to the Numbering Audit Program.

Dated: March 11, 2002

Respectfully submitted,

GARY COHEN  
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By: /s/ STACIE M. CASTRO

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a certified copy of the foregoing documents **“FURTHER COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA”** and **“MOTION TO ACCEPT LATE-FILED COMMENTS”** on all known parties to **CC Docket No. 96-98, et al.** by mailing prepaid postage, first-class, a copy thereof properly addressed to each party.

Executed in San Francisco, California, on the 11th day of March 2002.

/s/ STACIE M. CASTRO

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Stacie M. Castro